

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 PLAZA HOTELS, LLC; STEVE KETTER; )  
 MICHAEL WILEY; OKC AIRPORT ES, )  
 LLC; ESH STRATEGIES FRANCHISE, )  
 LLC; KAJAL HOSPITALITY, INC; )  
 JALIYAN HOSPITALITY, INC; SUPER 8 )  
 WORLDWDE, INC; RAJ KRUPA HOTEL, )  
 LLC; DAYS INNS WORLDWIDE, INC; )  
 CHAND & SAAJ HOSPITALITY, INC; )  
 RAMADA WORLDWIDE, INC; YASH )  
 ENTERPRISES, INC; HOWARD )  
 JOHNSON INTERNATIONAL, INC; )  
 NOOR HOTEL, LLC; AMBICA, LLC; )  
 OM, LLC; INDRA, LLC; AND G6 )  
 HOSPITALITY FRANCHISING, LLC, )  
 )  
 Defendants. )

Case No. 5:25-cv-00462-G

**MOTION FOR ADMISSION *PRO HAC VICE* OF MALLORY BIBLO**

Kaylee Davis-Maddy, attorney for Super 8 Worldwide, Inc., Days Inns Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. (“Wyndham Franchisor Defendants”), respectfully requests this Honorable Court to enter an Order admitting Mallory Biblo of the law firm of DLA Piper LLP (US) (“DLA Piper”), to practice before this court in the above-captioned case and all proceedings or contested matters arising in or related to this case (including any further adversary proceedings) on behalf of the Wyndham Franchisor Defendants and in support thereof states as follows:

1. Ms. Biblo is currently an attorney with the law firm of DLA Piper with an address of 1900 N. Pearl St., Suite 2200, Dallas, TX 75201, telephone number of (214) 743-4500 and an email address of [Mallory.biblo@us.dlapiper.com](mailto:Mallory.biblo@us.dlapiper.com).

2. She was admitted to the bar of the state of Texas in 2013 and has remained in good standing since her admission. She has also been admitted to practice in the state of New York, the Fifth Circuit Court of Appeals, the United States District Court for the Northern District of Texas, the United States District Court for the Eastern District of Texas, the United States District Court for the Southern District of Texas, and the United States District Court for the Western District of Texas.

3. She has never been subject to any disciplinary action by any bar association.

4. The Wyndham Franchisor Defendants desire to have Ms. Biblo serve as their counsel, in association with the Movant, in this action.

5. Pursuant to Local Rule 83.2(g), Ms. Biblo's Request for Admission Pro Hac Vice is attached hereto as Exhibit 1, and she is simultaneously tendering the required fees.

6. Movant believes Ms. Biblo is qualified for *pro hac vice* and that just cause exists for such admission.

WHEREFORE, Kaylee Davis-Maddy, as attorney for the Wyndham Franchisor Defendants, respectfully requests this Honorable Court to enter an Order admitting Mallory Biblo to practice before this Court for the limited purpose of representing the Wyndham Franchisor Defendants in this action and any proceedings or contested matter arising in or related to this action, including pending and any further adversary proceedings.

Dated: May 29, 2025

**DOERNER, SAUNDERS, DANIEL &  
ANDERSON, L.L.P.**

Respectfully submitted,

Doerner, Saunders, Daniel  
& Anderson, L.L.P.

s/ Kaylee P. Davis-Maddy

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*Attorneys for Super 8 Worldwide, Inc., Days  
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and Howard Johnson International, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on May 29, 2025, a true and correct copy of the foregoing document was served upon the following via the Court's electronic notification system, electronic mail to:

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*s/ Kaylee P. Davis-Maddy*